



Director
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FCC 12-167 Federal Communications Commission: Rates for Interstate Inmate Calling Services

Comment on Proposed Rule Making

We believe phone rates for inmate telephone calls should be reasonable and competitively priced. However, we strongly argue that prison telephone service cannot be the same as service offered in the community. Any rule passed to regulate phone call costs must take into consideration the unique nature of corrections and the important need to balance security needs and family contact. We further believe that the prices that are charged in our facility are both just and reasonable, having been the process of an open and competitive bidding process, wherein we were able to choose the provider that delivered the best service to our facility and our inmates' friends and family members with the best possible price.

Family Contact

We recognize the value of retaining family contact during incarceration. The reduction in recidivism is well-documented. Telephone service privileges are provided in our facility and contact is encouraged.

Security Needs

The inmate telephone system we currently use offers a powerful investigative component that contributes to a successful intelligence gathering process. This service ensures the safety and security of our correctional facility. Supporting this option is critical for the safety of staff

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and inmates, as well as for the continued reduction and prosecution of crimes. Were we to lose the ability to pay for such technology because of a cap on telephone rates, it would be extremely detrimental.

Current Contract Services and Costs

The current provider of phone services in our facility was chosen following our competitive bidding rules and public procurement requirements. The calling rates that our inmates' friends and family members would be paying were evaluated as part of the procurement process.

Commissions are included in the contract structure. Funds received are used for the well-being of the inmate population, and provide support for a number of programs designed to assist the inmates while incarcerated and upon their eventual release. Any changes in fee structure would result in reductions in services to inmates, with no offset funding available to replace lost commissions.

We request that during the rule-making process consideration be given to balance the needs of the inmate, families and security in a manner that always factors safety into the equation. Revenue must be sufficient to provide the services required and requested, and consideration should be given to other services provided as a result of the phone contracts.

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